

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EUGENE MOROZOV and MEM CONSULTING INC.,)	
)	
)	
Plaintiffs,)	
)	
v.)	C.A. NO. 1:18-cv-03421 (GBD) (SLC)
)	
)	
ICOBX HUB INC., ICOBOX, ALEX)	
MOSKOVSKY, and NICKOLAY EVDOKIMOV,)	
)	
Defendants.)	
)	

DECLARATION OF DIMITRY JOFFE, ESQ.

I, Dimitry Joffe, Esq., a member of the New York State Bar, declare as follows:

1. I am counsel to Plaintiffs in the above-captioned case, and I submit this declaration in support of Plaintiffs' motion for an order of examination and attachment.

2. Attaches as Exhibit A hereto is a true and correct copy of a request by plaintiff Securities and Exchange Commission ("SEC") for entry of default against defendants ICOBOX and Nikolay Evdokimov in SEC v. ICOBOX and Evdokimov, 2:19-cv-08066 (C.D. Cal.) (the "SEC Action").

3. Attaches as Exhibit B hereto is a true and correct copy of the default entered against ICOBOX and Nikolay Evdokimov in the SEC Action.

4. Attached as Exhibit C hereto is a true and correct copy of the complaint in Anaykin et al. v. Evdokimov et al., No. 2:19-cv-08165-DSF-AFM (C.D. Cal. Sept. 20, 2019).

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: November 5, 2019

Respectfully Submitted,

A handwritten signature in blue ink, reading "Dmitry Joffe", with a long horizontal flourish extending to the right.

Dimitry Joffe
Joffe Law P.C.
765 Amsterdam Avenue, 2C
New York, NY 10025
Tel: (917) 929-1964
Email: dimitry@joffe.law
Counsel to Plaintiffs